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**U.S. Department of Justice** 

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 23, 2020

**BY ECF** 

The Honorable Sydney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007 **MEMO ENDORSED** 

Re: United States v. Junior Vladimir Jimenez-Castillo, et. al., 19 Cr. 570 (SHS)

Dear Judge Stein:

With consent of counsel for the remaining defendants, the Government writes to request respectfully that the Court exclude time under the Speedy Trial Act. At a conference on March 4, 2020, the Court excluded time under the Speedy Trial Act until June 22, 2020, the date of the then-scheduled final pretrial conference. On June 2, 2020, the Court adjourned the trial date and set a new final pretrial conference for August 28, 2020.

The Government, therefore, respectfully requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today's date, June 23, 2020, to and including August 28, 2020, to allow the parties to discuss a possible pretrial disposition and allow the defense to prepare for trial. Counsel for Junior Vladimir Jimenez-Castillo and Jose Verra Velez consent to this request.

**Application granted.** 

Dated: New York, New York June 25, 2020

SO ORDERED

SIDNEY H. STEIN

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

Kyle A. Wirshba / Nicholas Chiuchiolo

Assistant United States Attorney

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All counsel (by ECF)

cc: